Via ECFS

June 28, 2018

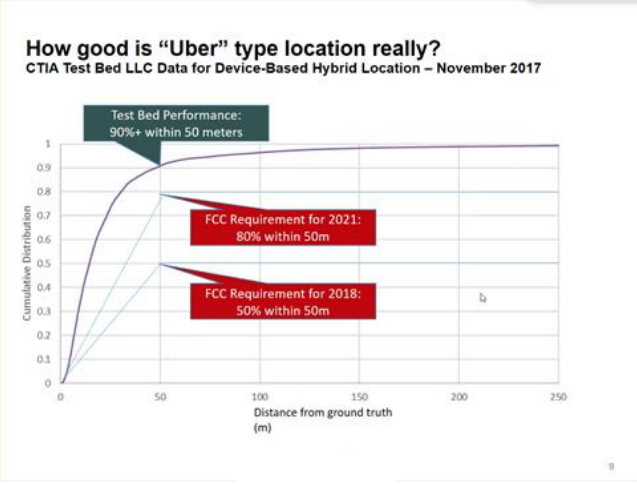
Marlene H. Dortch
Secretary Federal Communications Commission
445 12th Street, SW Washington, DC 20554
In the Matter of Location-Based Routing for Wireless 911 Calls
PS Docket No. 18-64

To Whom it May Concern,

I write this letter to urge the FCC to continue to allow third-party applications and providers to deliver supplementary location information for 9-1-1 calls "over the top" directly to PSAPs without needing to interconnect to carrier routing elements. This ability for new entrants to push the industry forward with new technology solutions can be an effective way today to address the oft-stated problem of "Uber can find me so why can't 9-1-1?"

More than 75% of Fairfax County's 9-1-1calls received are made from wireless devices. We understand that a Roadmap for Location Accuracy[1] ("the Roadmap") has been agreed to with NENA, APCO and the major wireless carriers, and that the Roadmap contains a multi-year schedule commitment for improving location accuracy for only 80% of wireless calls stretching into 2021. Europe has already introduced significantly greater capabilities in many countries by implementing Advanced Mobile Location (AML) in coordination with Public Safety Answering Points (PSAPs).

Technology for providing device-based hybrid location information for wireless callers has vastly improved and been demonstrated since the signing several years ago, of the FCC Location Accuracy Roadmap agreement. The chart below uses information from the November 2017 CTIA Test Bed study for device-based location accuracy and shows that today, such technology can exceed the requirements in place for carriers for 2021, three years ahead of schedule.



[1] https://psc.apcointl.org/2014/11/15/apco-and-nena-reach-consensus-plan-with-major-wireless-carriers-on-improvements-to-locating-9-1-1-callers/

It is an urgent matter in the interest of improving public safety that the carriers act now to implement device-based hybrid location capabilities, ahead of the schedules set forth in the Location Accuracy Roadmap. To stifle the ability of third-party providers and applications by mandating they only work through the carrier interconnect routing elements is against the public interest. Several recent cases in the news have demonstrated that lives of emergency callers have been lost due to the inability to locate a caller because of the inadequacy of the current wireless location technologies in use in the 9-1-1 industry[2,3]. Why should citizen safety be constrained to a Roadmap that is now almost four years old when technology has made rapid improvements? The carriers should be encouraged to make necessary improvements but restricting third-party providers by putting them under the control of carrier processes[4] is not a reasonable method to foster continued innovation in 9-1-1.

Smartphone operating system providers, such as Google and Apple, have publicly announced the capability to support device-based hybrid location information through various offerings such as Emergency Location Services (ELS) and Hybridized Emergency Location (HELO), respectively. When that capability is enabled through third-party solution providers the interest of the public will be served by integrated delivery of this life-saving technology.[5] Today, PSAPs across the nation are acting by upgrading their call handling, map, and computer aided dispatch systems to support standards-based, native integration of device based hybrid location and other supplemental information. PSAPS must be careful in the technology choices they adopt and proper evaluation of any third-party provider before committing to implement a supplemental location delivery solution into their operations is critical. PSAPs, however, should be allowed to improve the location information choices available in the manner and timeframe that best serves their community as they are ultimately responsible for sending the appropriate response for emergency situations.

Our interest is to provide 9-1-1 callers with superior customer service and that level of service begins when the best available information on where a call for emergency services originated is provided to the PSAP in a timely manner. We urgently request that device location information be allowed to be provided to PSAPs for wireless 9-1-1 calls through all available means ("over the top" and "interconnected carrier elements").

We understand that the Roadmap was believed to be a realistic and appropriate schedule for improving location accuracy at the time it was instituted. Our concern is that it is now perceived to be the only commitment to making improvements in location accuracy for 9-1-1. Clearly, the advancement of technology by companies such as Google and their ELS capability, as well as Apple with their supplemental HELO technology demonstrate that improvements are available now that could shave up to one or two years off the agreed to accuracy schedule in the Roadmap.

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[2] https://www.whio.com/news/local/cincinnati-teen-found-dead-school-parking-lot-after-911-calls-pleading-for-help/15VKCvMXaCuWoxHiwc3OKP/

[3] https://www.ajc.com/news/911-tape-drowning-woman-coherent-call-brought-rescuers/sPTiRLID8Cm0HXZ76OP4uN/

[4] Comments of West Safety Services, Inc., May 7, 2018, FCC PS Docket No. 18-64, Location Based Routing for Wireless Calls, https://ecfsapi.fcc.gov/file/1050893279167/West%20Safety's%20Comments%20to%20LBR%20NOI%20FINAL.pdf

[5] http://www.eena.org/pages/aml-stories-around-europe#.Wvnqqi-ZNTY

We ask for urgent attention to this matter now. Life threatening situations occur almost every day where location information is not accurate enough in the PSAP for 9-1-1. Under stress, people suffering from traumatic injuries can verbally give the wrong address or cannot articulate clearly where they are. With hybrid device-based location available on the call taker's screen as supplemental data, emergency assistance can be sent to the device location which can save a life when minutes and seconds count.

Sincerely,

Steve McMurrer
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